

Subject: comments on proposed orca critical habitat
From: "Sarah Huntington" <huntingtonsj@yahoo.com>
Date: Wed, 14 Jun 2006 15:52:06 -0700
To: <orcahabitat.nwr@noaa.gov>

I would like to submit comments on the proposed orca critical area.

It is encouraging that the National Marine Fisheries Service has taken the step of proposing a roughly 2500 square mile area of Puget Sound as critical habitat to protect the resident orca pods, which were designated as endangered last November.

As I understand the proposal I believe there are several points that need further consideration and tighter controls:

- Salmon fishing limits: The orcas feed primarily on salmon. The population of all species of salmon native to Washington State is in serious decline. It is essential to the survival of the orcas that protection and recovery of the salmon fishery be a primary component of the final decision on this proposal. Even without the reliance of the orcas on salmon for survival, that fishery is not yet recovering from the pressures on it, in spite of significant efforts to effect such improvement. Public pressure to leave fishing limits where they are must not take precedence in this decision. Not only will we lose the orcas, but the salmon as well.
- Storm water and sewer discharge: Further steps must be taken to eliminate the discharge of untreated sewage and contaminated storm water into Puget Sound. This is not only critical for salmon and orcas, but other fisheries like oysters, as well as the health and safety of human beings in the region.
- Pollution: All other types of pollution entering the Puget Sound must continue to be reduced and eliminated.
- Skagit & Columbia Rivers: Since the Skagit and Columbia rivers empty enormous amounts of water into Puget Sound, they need to be included in the critical area designation. Not only does the quality of the water they discharge affect the sound, but they are also critical spawning habitat for Chinook and other salmon species, essential to the health and survival of the orcas. While the rivers themselves are managed and monitored, the reduction of pollutants from the entire river drainages must be a component of the final determination for this habitat. Pesticides from lawn care, oil spills from aging cars and the like, all need more intensive controls.
- Military sites: There is no excuse for exempting military sites bordering the sound from compliance with the requirements of this critical habitat designation. The activities on those sites impact the orcas as much as and probably significantly more than that of any other area of the same size. In fact, since the of critical habitat designation mandates that no federal activities can take place within it unless it has been demonstrated that the habitat and orcas won't be harmed, exempting military sites would be inconsistent and open to law suit to bar those activities until they had been proven safe.
- Underwater sonar tests: Apart from the general need to require military sites to comply with the demands of this critical habitat designation, the final regulation must include severe restrictions on any and all underwater testing of sonar within the area of Puget Sound.
- Hanford: There is a large underground plume of radioactive waste inexorably working its way from Hanford toward the Columbia River. With all the haggling over cleanup of the Hanford site, to my knowledge there has been no effort to do more than monitor this lethal ground-water flow. When it hits the river, the river will die, as will significant portions of Puget Sound. Only areas toward the north end of the sound might escape this millenia-long poisoning, due to inflow of "clean" water from the Pacific. If we're serious about saving orcas and Puget Sound, we had better begin taking draconian steps to halt this looming disaster.

Thank you for giving these comments due consideration.

Kind regards,
Sarah Huntington
5171 Roney Rd.
Bow, WA 98232
360-766-3201

Subject: Revise Orca Critical Habitat Definition

From: "Sarah Huntington" <huntingtonsj@yahoo.com>

Date: Tue, 8 Aug 2006 13:12:05 -0700

To: "orcahabitat.nwr@noaa.gov" <orcahabitat.nwr@noaa.gov>

Dear NOAA,

ALL Puget Sound waters need to be designated as critical habitat for the recovery of Southern resident orcas. Specifically:

1) SHALLOW WATERS: INCLUDE nearshore waters shallower than 20 feet for specific issues, including specifically noise and pollution control. You can't draw a line in water: toxic contaminants, noise and fish flow in a continuum in water.

2) MILITARY EXCLUSIONS: Military sites bordering the sound should not be exempted from compliance with the requirements of this critical habitat designation. The activities on those sites impact the orcas as much as and perhaps more than that of other areas of the same size. In fact, since the critical habitat designation mandates that no federal activities can take place within it unless it has been demonstrated that the habitat and orcas won't be harmed, exempting military sites would be inconsistent with the designation and would open it up to law suit to bar those activities until they had been proven safe.

A better approach would be for NOAA to work with the military through specific agreements to ensure that they are able to do what they need to do for national security, without harm to the whales, and without wholesale exclusions that leave important habitat areas open to impacts of all kinds.

3) NOISE: Noise levels need to be included as "Essential Features" for orcas' critical habitat (the other essential features are: clean water, enough food, and safe passage). It is important for orcas that sound levels are below thresholds that inhibit communication and foraging activities or result in temporary or permanent hearing loss.

4) HOOD CANAL: Hood Canal needs to be included as critical habitat for orcas. Until recently resident southern orcas regularly used Hood Canal, and as we recover the health of Hood Canal and restore its salmon populations, the Canal will be an important area for the orcas' continued survival.

5) Areas of the Pacific Coast should be included in the critical habitat - especially the Olympic National Marine Sanctuary.

Respectfully yours

Sarah Huntington
huntingtonsj@yahoo.com
5171 Roney Rd.
Bow, WA 98232